

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

DEBRA LYNN MERCER-ERWIN (1)

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§

No. 4:20-CR-212
Judge Mazzant

GOVERNMENT TRIAL EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION	ADMIT
1	CyrusOne Server Physical Exhibit	4/11/23
1A	Ledger from CyrusOne Server	4/11/23
1B	Search Warrant for CyrusOne Server	4/12/23
1C	Scanned Docs from CyrusOne Server	4/12/23
1E	Sample Transactions by AGC from CyrusOne Server	4/12/23
1F	Server Extraction of American Express Transactions from CyrusOne Server	4/12/23
1G	Server Extraction of Escrow Agreements & EFaxes for AGC (Binder – physical exhibit)	4/12/23
2A	Mercer Email Attachment 9H-DTY-S6146 Escrow Agreement (EA)	4/12/23
2B	Mercer Email Attachment 9H-LZM-S6073 EA	4/12/23
2C	Mercer Email Attachment N253MY-S23974 EA	4/12/23
2D	Mercer Email Attachment N351AA-S24032 EA	4/12/23
2E	Mercer Email Attachment P4-GIS-S139 EA	4/12/23
2F	EFax	4/12/23
3A	Mercer Email Attachment N784CK-S24783 EA	4/12/23
3B	Mercer Email Attachment N784CK-S24783 First Amendment (FA) EA	4/12/23
3C	Mercer Email Attachment N784CK-S24783 Executed (E) EA	4/12/23
3D	Mercer Email Attachment N571UA-S27311 EA	4/12/23

EXHIBIT NO.	DESCRIPTION	ADMIT
3E	Mercer Email Attachment N571UA-S27311 FAEA	4/12/23
3F	Mercer Email Attachment N571UA-S2731 EEA	4/12/23
3G	Mercer Email Attachment N572UA-S27312 EA	4/12/23
3H	Mercer Email Attachment N572UA-S27312 FAEA	4/12/23
3I	Mercer Email Attachment N572UA-S27312 EEA	4/12/23
3J	Mercer Email Attachment P4-GIS-S139	4/12/23
4A	Mercer Email Attachment B-8211-S212 Letter of Intent (LOI)	4/12/23
4B	ATT00001(3) – Mercer Email B-8211-S212	4/12/23
4C	Mercer Email Attachment B-16720-S41820 Purchase Agreement (PA)	4/12/23
4D	329950 Email and Attachments (Escrow & ATT0001) – Mercer Email B-16720-S41820	4/12/23
4E	Mercer Email Attachment B-16720-S41820 Third Amended (TA) EA	4/12/23
4F	Mercer Email Attachment B-16720-S41820 EA	4/12/23
4G	329619 Email and Attachments (Escrow (1) & ATT00001(1) – Mercer Email B-16720-S41820	4/12/23
4H	329607 Email and Attachments (Escrow & txt file) - Mercer Txt file B-16720-S41820	4/12/23
5A	322236 - Moffett Email P4-GIS-S139	4/12/23
5B	Moffett Email B-8108-S5129 Refund Undertaking	4/12/23
5C	Moffett Email B-8108-S5129 Letter	4/12/23
5D	Mercer Email B-8108-S5129 LOI	4/12/23
5E	317931 – Moffett Email P4-GIS-S139	4/12/23
6A	Mercer Email VT-SUG-S4387 EA	4/12/23
6B	Mercer Email VT-SUG-S4387 PA	4/12/23
6C	329727 - Mercer Email VT-SUG-S4387	4/12/23
6D	Mercer Email VT-ALF-S36305 PA	4/12/23

EXHIBIT NO.	DESCRIPTION	ADMIT
6E	Mercer Email VT-ALG-S36306 EA	4/12/23
6G	329629 – Email and Attachments (Escrow & ATT00001) Mercer Email VT-SUG-S4387	4/12/23
6H	EFax	4/12/23
7A	329919 – Email and Attachments (Escrow & ATT00001(1)) Mercer Email B-8197-S9473	4/12/23
7B	Escrow Agreement from Casey @ TBE	4/18/23
7C	Mercer Email SU-GDN-S38288 / SU-GDP-S38290 EAs	4/12/23
7D	Mercer Email 9M-FSL-S29062 EA	4/12/23
7E	Mercer Email 9V-SWB-S33377 FA Promissory Note	4/12/23
7F	329719 – Email & Attachments (Escrow & ATT00001)– Mercer Email SU-GDN-S38288 / SU-GDP-S38290	4/12/23
7G	EFax	4/12/23
8A	Mercer Email 9V-SWA-34568 Second Amendment to Promissory Note	4/12/23
8B	Mercer Email 9V-SWB-S33377 Second Amendment to Promissory Note	4/12/23
8C	Mercer Email ET-ALO-S33768 EA (CCUR)	4/12/23
8D	Mercer Email ET-ALO-S33768 EA (JDS1)	4/12/23
8E	Mercer Email ET-ALP-S33769 EA (CCUR)	4/12/23
8F	Mercer Email ET-ALP-S33769 EA (JDS1)	4/12/23
8G	329606 – Email and Attachments (Escrow & ATT00001) – Mercer Email ET-ALO-S33768	4/12/23
8H	Mercer Email Trust Number 3020-3028-3252	4/12/23
8I	Mercer Email VH-LQD-S4371 EA	4/12/23
8J	Mercer Email VH-LQF-S4375 EA	4/12/23
8K	Mercer Email VH-LQG-S4376 EA	4/12/23
8L	358444 Email – Mercer Email VH-LQD-S4371 - VH-LQF-S4375 - VH-LQG-S4376	4/12/23

EXHIBIT NO.	DESCRIPTION	ADMIT
8M	Mercer Email VQ-BNU-S29908 PA	4/12/23
8N	Mercer Email VQ-BNU-S29908 EA	4/12/23
8O	Mercer Email 9M-FSL-S29062 PA	4/12/23
8P	Mercer Email 9M-FSL-S2906 EA	4/12/23
8Q	Mercer Email B-2064-S29157 PA	4/12/23
8R	Mercer Email B-2064-S29157 EA	4/12/23
8S	Mercer Email EI-UUW-S30214 PA	4/12/23
8T	Mercer Email EI-UUW-S30214 EA	4/12/23
8U	Mercer Email VT-JES-S35159 Second Amendment (SA) EA	4/12/23
8V	Mercer Email VT-JEU-S35160 SAEA	4/12/23
8W	EFax	4/12/23
9A	Mercer Email HL-8254-S40198 EA	4/12/23
9B	Mercer Email HL-8254-S40198 Amended Letter Agreement	4/12/23
9C	EFax	4/12/23
10A	Mercer Email HL-8284-S40199 EA	4/12/23
10B	Mercer Email Pk-GIA-S40074 EA	4/12/23
10C	Mercer Email PK-GIK-S40073 EA	4/12/23
10D	8/5/20 – Machado /Mercer SMS	4/12/23
10E	8/5/20 – 8/7/20 Mercer/Chemtov SMS	4/17/23
10F	8/5//20 - Machado/Chemtov WA	4/12/23
10G	EFax	4/12/23
11A	Moffett Email S4424 Letter	4/12/23
11B	Moffett Email S4424 EA	4/12/23
11C	EFax	4/12/23
12	Bank of America Records – 9094 American Guaranty Company - 2015	4/11/23

EXHIBIT NO.	DESCRIPTION	ADMIT
13	Bank of America Records – 9094 American Guaranty Company - 2016	4/11/23
14	Bank of America Records – 9094 American Guaranty Company - 2017	4/11/23
15	Bank of America Records – 9094 American Guaranty Company – 2018	4/11/23
16	Bank of America Records – 9094 American Guaranty Company - 2019	4/11/23
17	Bank of America Records – 9094 American Guaranty Company - 2020	4/11/23
18	DLE Escrow – Bank of America - 1222	4/11/23
19	CrossFirst (Wright Brother's Bank Account – 6592)	4/13/23
20	Navy Federal Credit Union – Kayleigh Moffett	4/11/23
21	Bank of America – Gustava Ramirez - 2425	4/11/23
22	Hard drive containing Phone images of Kayleigh Moffett and Debra Mercer	4/11/23
22A	Cell Phone Image from Hard Drive of Kayleigh Moffett 405-314-5168	4/11/23
22C	Text files from 405-314-5168 dated 8/27/2015	4/11/23
23A	Cell Phone Dump of Apple iPhone 11 of Federico Machado – 754-581-2809	4/11/23
23B	Extraction Report of Cell Phone Dump of Apple iPhone 11 of Federico Machado – 754-581-2809	4/11/23
23C	Text Chats from Federico Machado iPhone dated 08/28/2015 and 02/20/2019	4/11/23
23E	Text Chats from Federico Machado iPhone pgs 822-861	4/17/23
24	Image of Apple Computer of Federico Machado	4/11/23
25A	PowerPoint for N200Y	4/12/23
25B	PowerPoint for Ledger (Ex. 1A)	4/12/23
25C	PowerPoint for Ledger (Ex. 2)	4/12/23
25D	PowerPoint for Ledger – Sewell Ex. 1	4/12/23
25E	PowerPoint for Ledger – Hodkinson Ex. 1	4/12/23
25F	PowerPoint Summary	4/12/23

EXHIBIT NO.	DESCRIPTION	ADMIT
26B	Census – Nonexistence – AGC	4/21/23
32	2020 Escrow Fees from Debra Mercer server	4/17/23
33A	OFAC License determination	4/21/23
33B	OFAC License determination	4/21/23
39	FAA Clarification Memo 2013	4/12/23
43	AGC Website (with modification)	4/11/23
45A	Wires Spreadsheet of 9094	4/13/23
49	Photo of Guillermo Garcia Mendez	4/11/23
N456PF		
51A	Blue Ribbon	4/11/23
N260RC		
52A	Blue Ribbon Registration	4/11/23
52B	Photograph of plane	4/27/23
N18BA/N299GS		
53A	Blue Ribbon for N18BA	4/11/23
N305AG		
54A	Blue Ribbon	4/11/23
54B	Photos of Plane	4/20/23
54C	AMOC	4/24/23
54D	Photos of plane at landing strip	4/20/23
54E	Video of Plane taking off	4/20/23
54G	Drugs	4/20/23
54H	Lab Report	4/20/23
54K	Text Exchange between Debra Mercer-Erwin and Federico Machado dated 02/06/2020	4/21/23

EXHIBIT NO.	DESCRIPTION	ADMIT
N311BD		
55A	Blue Ribbon	4/11/23
55B	Photo of Plane	4/24/23
55C	AMOC	4/24/23
55F	Lab Report – Belize 02-11-2021 – 10k	4/19/23
55G	Photos of Physical Drugs seized	4/19/23
55H	Immigration Information	4/24/23
55J	Photo of Heriberto Calderon Gastelum	4/24/23
55M	Photo of Drugs in plane	4/19/23
N569LM		
56A	Blue Ribbon	4/11/23
56B	Photo of plane – BIS seizure from Brownsville	4/27/23
N515BA		
57A	Blue Ribbon	4/11/23
57B	Photo of Plane	4/24/23
57C	AMOC	4/24/23
57D	Photos of crash site	4/24/23
N770SW		
58A	Blue Ribbon	4/11/23
58D	Photo of Federico Machado	4/11/23
N224EA		
59A	Blue Ribbon	4/11/23
59B	Photo of Plane	4/24/23
59C	AMOC	4/24/23
59D	Video of crash site	4/24/23

EXHIBIT NO.	DESCRIPTION	ADMIT
59E	Photo of crash site	4/24/23
N241CW		
60A	Blue Ribbon	4/11/23
60B	Photo of Plane	4/24/23
60C	AMOC	4/24/23
60D	Photos of crash site	4/24/23
N322BC		
61A	Blue Ribbon	4/11/23
61B	Photo of Plane	4/24/23
61C	AMOC	4/24/23
61D	Photo of seizure of Plane	4/24/23
N35531/N454SC		
62A	Blue Ribbon	4/11/23
62B	Photo of Plane	4/24/23
62C	AMOC	4/24/23
62D	Photos of seizure of Plane	4/24/23
N465BC		
63A	Blue Ribbon	4/11/23
63B	Photo of Plane	4/24/23
63C	AMOC	4/24/23
63D	Photos of seizure of Plane	4/24/23
N530GA		
64A	Blue Ribbon	4/11/23
64B	Photos of Plane	4/25/23
64C	AMOC	4/25/23

EXHIBIT NO.	DESCRIPTION	ADMIT
64D	Photos of crash site	4/25/23
N939RR		
65A	Blue Ribbon	4/11/23
65B	Photo of Plane	4/20/23
65C	AMOC	4/25/23
65D	Photos of Drugs	4/20/23
65G	Lab Results Cocaine 11.45k	4/20/23
65H	Physical Evidence – Cocaine 11.45k	4/20/23
N990PA		
66A	Blue Ribbon	4/11/23
66B	Photos of Plane	4/25/23
66D	Photo of Plane crash site	4/20/23
N368AG		
67A	Blue Ribbon	4/11/23
N2000		
68A	Blue Ribbon	4/11/23
N466MM/NN886N		
69A	Blue Ribbon	4/11/23
69B	Photos of Plane	4/25/23
69C	AMOC	4/25/23
69D	Photo of plane and drugs	4/25/23
N884AB		
71A	Blue Ribbon	4/11/23
N740HB		
72A	Blue Ribbon	4/11/23

EXHIBIT NO.	DESCRIPTION	ADMIT
N777EH		
73A	Blue Ribbon	4/11/23
73B	Photo of Plane	4/20/23
73C	AMOC	4/25/23
73D	Photos of Drug Seizure of Plane	4/20/23
73H	Drugs	4/20/23
73I	Lab Report	4/20/23
73K	Jessie Villareal PowerPoint	4/24/23
75	Villarrutia Bank of America	4/13/23
96A	Photo of Plane N190JH	4/11/23
96B	N190JH Notice of Abandonment	4/11/23
96C	Video of Plane taking off	4/11/23
96D	Blue Ribbon of N190JH	4/11/23
98A	Photos from seizure at 6007 Lytham Drive, Dallas, Texas	4/19/23
98B	Drugs seized from 6007 Lytham Drive, Dallas, Texas and press	4/19/23
98C	Lab reports for seizure at 6007 Lytham Drive, Dallas, Texas	4/20/23
98D	Miscellaneous documents seized from 6007 Lytham Drive, Dallas, Texas	4/20/23
100	Plea Agreement for Raul Francisco De ASIS Quevedo Martinez	4/19/23
105	Plea Agreement for Julio Cesar Olivas-Felix	4/20/23
111	CrossFirst Bank Statements (5964)	4/13/23
112	CrossFirst Bank Statements (9783)	4/13/23
113	CrossFirst Bank Statements (1356)	4/13/23
114	Bank of America Bank Statements (9081)	4/11/23
116A	Sonia Hurtado Summary Powerpoint	4/18/23
120	Photos of N173KS	4/25/23

EXHIBIT NO.	DESCRIPTION	ADMIT
121	Bank of America letter regarding bank statements	4/11/23
123A	N375TC Blue Ribbon	4/25/23
123B	Photo of Plane	4/19/23
123C	Photos of crash site and seizure of drugs	4/19/23
126	Photograph of N6463L	4/24/23
127	Contract of Scott McCreary with AGC	4/27/23